

(CC Docket No. 98-676) (DA 02-2760)

Filed for Juanita Cook by Bob Segalman
REGARDING CC DOCKET NO. 98-67

COMMENTS TO FCC

As Co-chair of the Vermont Statewide Independent Living Council, a Speech-Language Pathologist, as well as a person with a disability (Osteogenesis Imperfecta), I am writing to you at the request of some of my peers who are concerned about an apparent shortfall in Vermont's compliance with requirements for recertification of Telecommunication Relay Services for people with speech disabilities (PSD).

The State appears to be out of compliance with 47 C. F. R., paragraph 64.604 - Mandatory minimum standards: to comply with these standards, Vermont should include STS in its TRS Outreach and Education Projects. The specifics required in the Minimum Standard are not appropriate outreach vehicles for reaching this population. STS outreach and educational programs should be appropriate to the needs of the population.

Vermont should annually publish details of its planned STS outreach and education program and an appropriate budget. Effective STS outreach is now done in the states of Washington, Minnesota, and Texas. We would encourage Vermont to study those models. Prior to recertification, we would ask that such a plan meet the standards required:

"Public access to information: Carriers, through publication in their directories, periodic billing inserts, placement of TRS instructions in telephone directories, through directory assistance services, and incorporation of TTY numbers in telephone directories, shall assure that callers in their service areas are aware of the availability and use of all forms of TRS. Efforts to educate the public about TRS should extend to all segments of the public, including individuals who are hard of hearing, speech disabled and senior citizens as well as members of the general public."

This is the only violation that has been brought to my attention. On behalf of my peers, I ask that plans for correction of this violation be submitted before TRS recertification is granted for Vermont.

Thank you.

M.S.

Pathologist and Co-chair
Vermont Statewide Independent Living Council
199 Sunset Hills
Pownal, VT 05261

Sincerely,
Juanita W. Cook,

Speech-Language